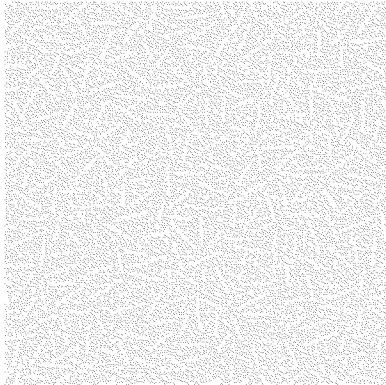


To: Schmittziel, Paula[Schmittziel.Paula@epa.gov]; Larry Perino[Larry.Perino@kinross.com]; Terry Turner[Terry.Turner@Kinross.com]
Cc: Wall, Dan[wall.dan@epa.gov]; Fagen, Elizabeth[Fagen.Elizabeth@epa.gov]; Brent Lewis (Brent_Lewis@blm.gov)[Brent_Lewis@blm.gov]; randy.perlis@state.co.us[randy.perlis@state.co.us]; Nathan M. Longenecker[Nathan.Longenecker@Kinross.com]
From: Pat Maley
Sent: Thur 7/30/2015 4:32:57 PM
Subject: RE: EPA Comments on Sunnyside Work Plans for Subsurface Investigation and for SW, GW and Solid Phase Media Investigation



Paula,

Thank you.

We will review your comments ASAP.

Pat

From: Schmittziel, Paula [mailto:Schmittziel.Paula@epa.gov]
Sent: Thursday, July 30, 2015 10:28 AM
To: Pat Maley; Larry Perino; Terry Turner
Cc: Wall, Dan; Fagen, Elizabeth; Brent Lewis (Brent_Lewis@blm.gov); randy.perlis@state.co.us
Subject: EPA Comments on Sunnyside Work Plans for Subsurface Investigation and for SW, GW and Solid Phase Media Investigation

Pat – Attached are EPA’s comments on the two work plans submitted by Sunnyside to EPA on July 14th. The two work plans that EPA has reviewed and provided comments on are:

- Subsurface Investigation Work Plan – Mayflower Mill and Tailings Impoundments Area
- Surface Water, Groundwater and Solid Phase Media Investigation Work Plan – Mayflower Mill and Tailings Impoundments Area

EPA reviewed the work plans for both technical considerations as well as quality assurance requirements. Consequently, there are four documents attached – 2 for each work plan. One document includes EPA’s technical comments from several EPA reviewers while the second document is a Crosswalk form for the review of the Quality Assurance Project Plan/Sampling and Analysis Plan (QAPP). For any QAPP that EPA reviews, EPA requires a Crosswalk to be completed by the preparer of the QAPP document. Because this requirement had not been previously explained to you, our reviewers completed the Crosswalk for each QAPP as part of their review. The Crosswalk serves multiple purposes:

1. It identifies all of the necessary requirements for a complete and acceptable QAPP.
2. It serves as a “road map” for the reviewer as to where in the document that particular requirement was addressed since each QAPP may be organized differently depending on the project and the organization preparing the QAPP.
3. Finally, it serves as the documentation throughout the review of the deficiencies and the corrections to address those deficiencies when the QAPP is re-submitted.

While the work plans and QAPPs are a reasonable start, EPA, BLM and the State believe that a face to face technical meeting between Sunnyside and EPA (separate from the meeting proposed in our letter of July 29th) would be beneficial to both of us in understanding Sunnyside’s intended path forward of its investigations. After you have considered our comments, please feel free to contact either Liz Fagan or myself so that we can schedule a technical meeting. Thank you.

Paula Schmittiel

Remedial Project Manager

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